



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 6

**1445 Ross Avenue, Suite 1200
Dallas, TX 75202-2733**

February 27, 2012

Kendall Clark, Forest Supervisor
Carson National Forest
208 Cruz Alta Road
Taos, NM 87571

Mrs. Clark,

In accordance with our responsibilities under Section 309 of the Clean Air Act (CAA), the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the Draft Environmental Impact Statement (DEIS) prepared by the U.S. Forest Service (USFS). The USFS proposes to add two new lifts for accessing high alpine terrain, upgrade three lifts to reduce lift wait and ride times, add two gladed areas for advanced to expert skiers, add a lift served mountain biking trail, add a snowtubing facility, add two new snowshoe trails, and reconfigure the parking lot to improve access to the ski area and sense of arrival at Taos Ski Valley.

EPA rates the DEIS as "LO" i.e., EPA has "not identified any potential environmental impacts requiring substantial changes to the proposal, and the DEIS adequately sets forth the environmental impacts of the alternatives." The EPA's Rating System Criteria can be found here: <http://www.epa.gov/oecaerth/nepa/comments/ratings.html>. Detailed comments are enclosed with this letter which more clearly identifies our concerns and the informational needs requested for incorporation into the Final EIS (FEIS). Responses to comments should be placed in a dedicated section of the FEIS, or its appendices, and should include the specific location where the revision, if any, was made. If no revision was made, a clear explanation should be included.

EPA appreciates the opportunity to review the DEIS. Please send our office two copies of the FEIS, and an internet link, when it is sent to the Office of Federal Activities, EPA (Mail Code 2252A), Ariel Rios Federal Building, 1200 Pennsylvania Ave, N.W., Washington, D.C. 20004. Our classification will be published on the EPA website, www.epa.gov, according to our responsibility under Section 309 of the CAA to inform the public of our views on the proposed Federal action.

If you have any questions or concerns, please contact Keith Hayden of my staff at hayden.keith@epa.gov or 214-665-2133 for assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Rhonda Smith", is written over the word "Sincerely,". To the right of the signature is a long, horizontal, wavy line.

Rhonda Smith

Chief, Office of Planning and Coordination

Enclosure

**DETAILED COMMENTS ON THE
U.S. FOREST SERVICE
DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR THE
TAOS SKI VALLEY'S 2010 MASTER DEVELOPMENT PLAN
PHASE 1 PROPOSED PROJECTS
CARSON NATIONAL FOREST
TAOS, NEW MEXICO**

BACKGROUND: In accordance with the standards and guidelines of the 1986 Carson Forest Plan, as well as the terms of the special use permit (SUP), a master development plan (MDP) was developed by the Taos Ski Valley (TSV) to identify goals and opportunities for future management of the TSV on National Forest Service lands. TSV's first MDP was approved by the USFS in 1981 and a new MDP was accepted by the USFS in 2010. The 2010 MDP was designed to improve operational efficiencies and the recreational experience at TSV in today's winter sports market. The proposed improvements are meant to move TSV into a more competitive role in the destination skier market.

The following comments are offered for your agency's consideration in completing the FEIS:

DETAILED COMMENTS

SUMMARY TABLE OF ENVIRONMENTAL CONSEQUENCES

The indicator quantifying the change in snowmaking coverage, water use, and impacts from water diversions does not make clear the temporal scale concerning acre feet (AF) of water use. Please update the table to more clearly reflect whether the AF of water use is on a weekly, monthly, or yearly basis.

2.0 ALTERNATIVES, INCLUDING THE PROPOSED ACTION

Adventure Center (Snowshoeing)

Please quantify how many acres of trees, measuring less than 4 inches in diameter, may possibly be removed for the snowshoeing trail.

3.0 AFFECTED ENVIRONMENT AND ENVIRONMENTAL CONSEQUENCES

Cultural Resources

Alternative 2 states the proposed activity has the potential to affect cultural resources and adjacent lands through improved access to terrain. While design features and best management practices (BMP's) are expected to nullify direct effects; there is no discussion of how improved access to cultural or historical sites as a result of the proposed action might indirectly affect

cultural resources. In the FEIS please discuss how the preferred alternative might bring users of the TSV into closer proximity with cultural resources and how those resources will be protected.

Air Quality

All construction activities have the potential to emit air pollutants and we recommend BMP's be implemented to minimize the impact of any air pollutants. Furthermore, construction and waste disposal activities should be conducted in accordance with applicable local, state, and federal statutes and regulations.

EPA encourages the use of clean, lower-emissions equipment and technologies to reduce pollution. EPA's final Highway Diesel and Non-road Diesel Rules mandate the use of lower-sulfur fuels in non-road and marine diesel engines beginning in 2007.

4.0 CONSULTATION AND COORDINATION

Agencies, Organizations, Tribal Governments, and Persons Contacted

Please include all comments received from consultation with Agencies, Organizations, Tribal Governments, and Persons Contacted in the FEIS.